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5 Attorneys for Plaintiff RAMON JERMAINE SAPP

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8 UNITED STATES DISTRICT COURT  
9 NORTHERN DISTRICT OF CALIFORNIA

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12 RAMON JERMAINE SAPP, ) NO. 03-1066 PJH  
13 Plaintiff, ) STIPULATION AND [PROPOSED]  
14 vs. ) ORDER EXTENDING DEADLINE FOR  
15 ) DISCLOSURE OF EXPERT REPORTS  
16 ) [FRP 26(A)(2)]  
17 COUNTY OF ALAMEDA, COUNTY OF )  
18 ALAMEDA SHERIFF'S DEPARTMENT, ) Current Trial Date: June 9, 2006  
19 SHERIFF CHARLES PLUMMER, sued herein ) Time: 8:30 a.m  
20 individually and in his capacity and as Sheriff, ) Place: Courtroom 3, 17th Floor  
21 Alameda County, PRISON HEALTH )  
SERVICES, INC., ALAMEDA COUNTY )  
MEDICAL CENTER dba HIGHLAND )  
HOSPITAL, and DOES 1 through 30; and )  
DOES 1 through 30, inclusive, )  
22 Defendants. )  
23 \_\_\_\_\_ )  
24  
25 IT IS STIPULATED AND AGREED BY PARTIES THROUGH COUNSEL OF RECORD, as  
26 follows:  
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28 The pre-trial discovery deadline in this case for exchange of expert witnesses and reports  
is currently set by this Court on June 29, 2005. The parties hereby jointly request that the court  
extend the discovery deadline for disclosure of expert reports until July 18, 2005. The current  
deadline for non-expert discovery is August 10, 2005.

1 The reason for this request is as follows:  
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3 This stipulation and request for extension of pre-trial deadline is brought pursuant to  
4 Local Rule 7-10(b). Outstanding discovery requests by plaintiff directed to defendants Alameda  
5 County Medical Center and Alameda County, Alameda County Sheriff's Department, Sheriff  
6 Charles Plummer and Prison Health Services, Inc. seek documents which plaintiff contends relate  
7 to and materially affect the scope and basis of likely expert opinion testimony at trial. Production  
8 of these documents is due on or about July 8 and 9, 2005. Plaintiff has raised concerns that  
9 without these documents, it may become necessary to engage in rounds of supplemental  
10 disclosures as documents are made available. The parties jointly request an extension of the  
11 disclosure date in order to complete production of documents and develop appropriate expert  
12 disclosures.

13 Further, the parties hereby stipulate that this Court order said continuance for good cause.  
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15 IT IS SO STIPULATED  
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17 DATED: 18

19 LAW OFFICES OF TRUDY L. MARTIN  
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22 Trudy L. Martin, Attorneys for Plaintiff  
23 RAMON JERMAINE SAPP  
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25 GALLOWAY, LUCCHESE, EVERSON & PICCHI  
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27  
28 By Martin J. Everson, Esq.  
Attorney for Alameda County Medical Center

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30 LAW OFFICES OF NANCY HUDGINS  
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33 By Matthew Grigg, Esq.  
34 Attorney for Alameda County, Alameda County  
35 Sheriff's Department, Sheriff Charles Plummer and  
36 Prison Health Services, Inc.  
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2 IT IS HEREBY ORDERED THAT  
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4 The pretrial expert disclosure date is continued from June 29, 2005, to July 18, 2005.  
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6 Parties will file and serve responses pursuant to FRCP on that date.  
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8 DATED: 6/28/05  
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11 UNITED STATES ~~MAGISTRATE~~ JUDGE  
12 DISTRICT  
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